

1     there where she said hairstylist for ten years or she  
2     met -- or next whatever -- whatever said I would  
3     probably put in -- the next -- next part of the  
4     conversation is -- I have to go back and look -- but I  
5     would -- I would just put in a note there and the  
6     things -- and then I would -- again, I would expand on  
7     those --

8           Q     Okay.

9           A     -- as far as building my -- building my  
10    notes.

11          Q     Okay.

12          A     Building my report notes.

13          Q     So the first time you would have tried to  
14    note down either typing or with a pen or a pencil or a  
15    magic marker or a crayon or anything what Ms. [REDACTED]  
16    told you would have been at least six and a half hours  
17    after the interview had ended?

18          A     No, sir. I -- like I say, I -- 3:00 o'clock  
19    -- I say four, four and a half.

20          Q     Well, 9:00 o'clock to -- to 3:30 would be  
21    six and a half, right?

22          A     Yes, sir, it would be.

23          Q     So -- so at least six and a half hours  
24    elas -- elapsed between the time the interview ended  
25    and you started putting anything down?

1           **A**     **Some time in between that.**

2           **Q**     Okay. And at 3:30 in the morning you're not  
3     sure you were taking -- started that at all? You're  
4     just guessing?

5           **A**     **I'm not guessing.**

6           **Q**     You're not guessing?

7           **A**     **No. I'm saying it probably was about that**  
8     **time when I got up, about 3:30.**

9           **Q**     And -- and are you definitive that when you  
10    got up at somewhere around 3:30 you started typing?

11          **A**     **Absolutely, sir.**

12          **Q**     You had your laptop with you?

13          **A**     **Yes, sir.**

14          **Q**     Okay. You started typing and at that point  
15    you just typed little tidbits. Is that what you said?

16          **A**     **That's what I was doing.**

17          **Q**     Okay. So you didn't write a full report --

18          **A**     **No. No, sir.**

19          **Q**     You weren't writing complete sentences or  
20    anything?

21          **A**     **No, sir.**

22          **Q**     Okay. And how was it you were able to  
23    remember what she told you during the interview six  
24    and a half hours earlier?

25          **A**     **Mr. Martin, I just have a knack for just --**

1 just remembering what was said to me. That's why I go  
2 and write my reports as it is. I don't make a lot of  
3 -- I write them as I recall them so -- and that's just  
4 the way it's been.

5 Q Okay. Do you remember the first five  
6 questions that I asked you during this deposition?

7 A You asked me about the documents and had I  
8 seen the exhibit -- those --

9 Q Well, I'm asking specifically. Do you  
10 remember the specific questions that I asked you just  
11 a few hours earlier this morning?

12 A No, sir, I didn't.

13 Q So you don't really have a memory that  
14 remembers the details of what went on, do you?

15 A For that particular interview, yes, sir, I  
16 do.

17 Q Well, why are you so confident of that?

18 A Because I listen to what she had to say, and  
19 I -- and I guarantee that that's what she told me.

20 Q You guarantee it?

21 A I'm confident, sir. I am confident.

22 Q And so what -- when did you go back next to  
23 make further additions or modifications to this  
24 document that you were adding tidbits of thought to?

25 A Any time between -- off and on -- any time

1 between the time I started until I finally sent -- I  
2 finally made -- made my -- my -- made my final report  
3 on those -- on those -- on that interview. It's gone.  
4 Slouch down, huh.

5 Q Okay. So -- so how much time exactly --  
6 January 30th is when you started, and we didn't get  
7 them until March. We didn't get your report on  
8 Ms. [REDACTED] until March. So was it over a month or  
9 really over two months that it took you to finish that  
10 report?

11 A Yes, sir.

12 Q And all that time you relied on nothing but  
13 your memory?

14 A Yes, sir.

15 Q And how long was the report when you first  
16 put in the tidbits on January 30th?

17 A Probably page, page and a half of just  
18 bullet -- just my little tidbit notes.

19 Q Okay. Just bullets, that's it?

20 A Yeah. It -- it -- it discussed, like I  
21 said, date, times and -- and just her comments -- the  
22 comments she made.

23 Q So between January 30th and March were you  
24 doing other work besides drafting this report of  
25 interview of [REDACTED]?